

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

REDSTONE LOGICS LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00485

JURY TRIAL DEMANDED

REDSTONE’S ANSWER TO DEFENDANTS’ COUNTERCLAIMS

Plaintiff Redstone Logics LLC (“Redstone”) hereby answers Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively “Defendants” or “Samsung”) counterclaims as follows:

PARTIES

- 23. Admitted.
- 24. Admitted.
- 25. Admitted.

JURISDICTION AND VENUE

- 26. Admit that Defendants’ counterclaims arise under the patent laws of the United States and that Defendants seek certain declaratory relief. Deny that Defendants are entitled to any such relief. Deny any other allegations in this paragraph.
- 27. Admit that venue is proper in this district. Deny any other allegations in this paragraph.

BACKGROUND

- 28. Admitted.
- 29. Admit that Plaintiff's allegations in its Complaint speak for themselves. Deny any other allegations in this paragraph.
- 30. Admit that there is a case or controversy between the parties concerning alleged infringement and validity of the Patents-in-Suit. Deny any other allegations in this paragraph.

COUNT I

Declaratory Judgment of Non-Infringement of U.S. Patent No. 8,549,339

- 31. Plaintiff realleges Paragraphs 23-30 as though fully set forth herein.
- 32. Denied.
- 33. Denied.

COUNT II

Declaratory Judgment of Non-Infringement of U.S. Patent No. 9,253,925

- 34. Plaintiff realleges Paragraphs 23-33 as though fully set forth herein.
- 35. Denied.
- 36. Denied.

COUNT III

Declaratory Judgment of Invalidity of U.S. Patent No. 8,549,339

- 37. Plaintiff realleges Paragraphs 23-36 as though fully set forth herein.
- 38. Denied.
- 39. Denied.

COUNT IV
Declaratory Judgment of Invalidity of U.S. Patent No. 9,253,925

- 40. Plaintiff realleges Paragraphs 23-39 as though fully set forth herein.
- 41. Denied.
- 42. Denied.

PRAYER FOR RELIEF

WHEREFORE, Redstone prays for the following relief with respect to Defendants' counterclaims:

- A. A judgment in favor of Plaintiff on all counterclaims asserted by Defendants;
- B. An adjudication that Defendants are not entitled to any relief on its counterclaims, including, without limitation, any fine or damages; and
- C. A dismissal with prejudice of Defendants' counterclaims;
- D. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against Defendants;
- E. Plaintiff's costs of suit against Defendants; and
- F. Any and all other relief as the Court may deem appropriate and just under the circumstances.

DEMAND FOR JURY TRIAL

Redstone demands a trial by jury on all issues so triable.

Dated: March 12, 2024

/s/ Reza Mirzaie

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Attorneys for Plaintiff Redstone Logics LLC

CERTIFICATE OF SERVICE

I certify that counsel of record who are deemed to have consented to electronic service are being served today, March 12, 2024, with a copy of this document via the Court's CM/ECF system.

/s/ Reza Mirzaie
Reza Mirzaie